

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

Filed 2-10-17
Clerk, U.S. District Court
Western District of Texas
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

IRVIN GONZALEZ,
a.k.a. Ervin Gonzalez,

Defendant.

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No. EP-17-

MJ 643 ATB

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 8, United States Code, Section 1326.
2. Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.
3. The Defendant has a prior criminal history.
4. There are no conditions or combination of conditions which will reasonably assure the appearance of Defendant at future court settings.


The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By:



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